

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

EMMANUEL CORNET, JUSTINE DE  
CAIRES, GRAE KINDEL, ALEXIS  
CAMACHO, JESSICA PAN, EMILY  
KIM, MIGUEL BARRETO, and BRETT  
MENZIES FOLKINS, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

TWITTER, INC.

Defendant.

C.A. No. 1:23-cv-00441-TMH

**PLAINTIFFS' MOTION TO PROVISIONALLY SEAL NOTICE OF  
SUPPLEMENTAL AUTHORITY AND ACCOMPANYING EXHIBITS**

Shannon Liss-Riordan (*pro hac vice*)  
Bradley Manewith (*pro hac vice*)  
Thomas Fowler (*pro hac vice*)  
LICHTEN & LISS-RIORDAN, P.C.  
729 Boylston Street, Suite 2000  
Boston, MA 02116  
(617) 994-5800  
Email: [sliss@llraw.com](mailto:sliss@llraw.com)  
[bmanewith@llrlaw.com](mailto:bmanewith@llrlaw.com)  
[tfowler@llrlaw.com](mailto:tfowler@llrlaw.com)

*Attorneys for Plaintiffs*

Kate Butler, Bar I.D. No. 6017  
Kate Butler Law LLC  
1509 Gilpin Ave, Suite No. 3  
Wilmington, DE 19806  
Phone: (302) 966-9994  
email: [kate@katebutlerlaw.com](mailto:kate@katebutlerlaw.com)

Pursuant to this Court's Manuals on filing, including Electronic Filing Tips for Attorneys and Electronic Filing of Sealed Civil Documents, Plaintiffs hereby move to provisionally seal their Notice of Supplemental Authority (attached as Exhibit 1) and accompanying exhibits (attached hereto as Exhibits 2-6 respectively).

The Notice of Supplemental Authority informs the Court of four arbitration awards (Exhibits B-E) that Plaintiffs' counsel have obtained on behalf of former Twitter employees who brought claims against Twitter in arbitration. Exhibit F is an arbitration demand that provides context. The Notice of Supplemental Authority (Exhibit A) also provides some detail and context for those awards.

Because Twitter takes the position that arbitration awards are confidential, Plaintiffs have filed the documents under seal.

Plaintiffs therefore request leave to provisionally file Exhibits A-F under seal. Because the arbitral awards contain some personally identifying information, if the Court is disinclined to permit the entirety of the documents to be filed under seal, Plaintiffs respectfully request the opportunity to submit redacted versions removing identifying information for the Claimants in those arbitrations.

Dated: November 26, 2024

Respectfully submitted,

EMMANUEL CORNET, JUSTINE DE  
CAIRES, GRAE KINDEL, ALEXIS  
CAMACHO, JESSICA PAN, EMILY KIM,  
MIGUEL BARRETO, and BRETT  
MENZIES FOLKINS, on behalf of  
themselves and all others similarly situated,

By their attorneys,

/s/ Kate Butler

Kate Butler, Bar I.D. No. 6017  
Kate Butler Law LLC  
1509 Gilpin Ave, Suite No. 3  
Wilmington, DE 19806  
Phone: (302) 966-9994  
Email: kate@katebutlerlaw.com

Shannon Liss-Riordan (*pro hac vice*)  
Bradley Manewith (*pro hac vice*)  
Thomas Fowler (*pro hac vice*)  
LICHTEN & LISS-RIORDAN, P.C.  
729 Boylston Street, Suite 2000  
Boston, MA 02116  
(617) 994-5800  
Email: sliss@llrlaw.com  
bmanewith@llrlaw.com  
tfowler@llrlaw.com

### **CERTIFICATE OF SERVICE**

I, Kate Butler, hereby certify that a true and accurate copy of the redacted version of this document was served on all counsel of record for Defendant via filing on the Court's CM/ECF system and that Plaintiffs have served the sealed version of this document on Defendant's counsel via email on November 26, 2024.

/s/ Kate Butler  
Kate Butler